

**PUBLIC COMMENTS, INCLUDING CONSOLIDATED SUBSTANTIVE COMMENTS
ISLE ROYALE DRAFT GENERAL MANAGEMENT PLAN /
ENVIRONMENTAL IMPACT STATEMENT**

SUMMARY OF PUBLIC COMMENTS

The *Draft General Management Plan and Environmental Impact Statement* for Isle Royale National Park was released for public comment in March 1998. Responses were received by mail, internet, and at four public meetings (St. Paul and Duluth, Minnesota, and Houghton and Ann Arbor, Michigan). Written comments were received from almost 300 individuals, agencies, and organizations, including a petition with an extensive list of names; over 300 comments were submitted on the internet (half of those comments may be attributable to a single individual); and there were 75-150 people at each of the four meetings. The number of comments is impressive, but the responses have been focused on understanding the comment patterns and trends among the many different ideas, concerns, complaints, and compliments that were expressed.

Many people found the proposed plan to be reasonable and, while not perfect for everyone, many people indicated that they could live with the proposal as drafted. There were, however, several areas of contention.

The greatest number of comments addressed the issue of the proposed nonmotorized waters zone. Many commenters expressed their desire for much more nonmotorized area than proposed (one comment included a petition with hundreds of individual signatures). Many stated that the existing level of motor noise is inconsistent with expectations of a wilderness area. Other commenters opposed the nonmotorized zones as being unduly restrictive to motorboaters and sailors.

Most commenters expressed support for the proposed motorized sensitive zones, though many suggested that the zones be renamed to be more descriptive of the desired quiet, no-wake conditions. Some people suggested that the amount of motorized sensitive zone be increased.

Another major point of contention was the proposed removal and relocation of docks. Some people expressed support for and others opposed the changes in dock locations, particularly at McCargoe Cove and Siskiwit Bay. Many commenters who favored moving the docks voiced support for separating motorized and nonmotorized uses to reduce noise in some areas. Many of those opposed to changes were concerned about losing motorized access to certain areas, felt that the proposal discriminated against motorboaters, or felt that the changes would be too costly.

Some people expressed concern about the reduction of overnight lodging facilities at Rock Harbor, while others indicated that they believe some reduction to be appropriate. Several people stated that the proposal to remove the shoreline motel units was premature and suggested that additional options should be considered for modifying the structures in some fiscally responsible way.

Other frequently heard responses included: opposition to removal of the Chippewa Harbor trail segment, requests for additional canoe/kayak campsites, support for and opposition to visitor reservation systems or other limiting measures for managing visitation, concern about the role of the United Nations in the park's U.S. Biosphere Reserve designation, and suggestions for making the park's operations more environmentally sustainable. Several environmental organizations expressed concern about potential water pollution resulting from motorboat use and requested more consideration of this issue.

It is important to understand that while public input is fundamental to responsible planning and greatly influences decision making in general management plans, the laws, regulations, and policies that govern the National Park Service and Isle Royale National Park must also be taken into account. The number of comments for or against certain proposals may not be meaningful because some people comment more than once (examples include the individual who sent many internet responses and the petition containing hundreds of names that was submitted by an environmental organization) and public response is not structured to represent a statistically valid sample of interested people. Public input on a general management plan is not a poll or a vote. Rather, the National Park Service must respond to the whole of the public response and must consider the merits of comments received from a diverse public and other agencies in the context of resource information, laws and mandates, and sound management practices.

SUBSTANTIVE COMMENTS

Substantive comments are defined by the Council on Environmental Quality as comments that :

- (a) question, with reasonable basis, the accuracy of the information in the *Draft General Management Plan / Environmental Impact Statement*
- (b) question, with reasonable basis, the adequacy of the environmental analysis
- (c) present reasonable alternatives other than those presented in the plan and environmental impact statement
- (d) cause changes or revisions in the proposal

In other words, substantive comments raise, debate, or question a point of fact or policy. Comments in favor of or against the proposed action or alternatives or those that only agree or disagree with NPS policy are not included. Substantive comments on the draft and the NPS replies to those comments are presented below, grouped into the following topics:

- Motorized use/water zones
- Docks
- Carrying capacity
- Rock Harbor lodge and concessions
- Use conflict/separation of uses
- Trails and campgrounds
- Wilderness
- Cultural resources management and interpretation
- Wildlife/natural resource protection
- Other topics
- Comments on the “Environmental Consequences” section
- Native American treaty rights
- Comments with detail beyond the scope of the *Draft General Management Plan / Environmental Impact Statement*

Motorized Use / Water Zones

Comment: The National Park Service should develop and adopt an alternative that would preclude all motorboats in Isle Royale National Park waters because they are noisy and cause water pollution. Other commenters suggested that the general management plan should contain a detailed plan for strongly discouraging the use of private motorboats for access to and movement within Isle Royale National Park and strongly encourage the use of existing public and commercial ferry services.

Response: Isle Royale is a wilderness maritime park. No effort was made during congressional wilderness deliberations to prohibit boats from the Lake Superior waters of the park. In fact, the following statement relating to boat docks from the congressional deliberations on Isle Royale wilderness indicates that Congress intended that motorboat use be permitted in the park: “The Committee understands that no significant expansion of boat dock numbers is anticipated, but that continued maintenance of these facilities is essential to the continued ease of access as well as the health and safety of the visitors.” (Senate report 94-1357).

Comment: For clarity, the motorized sensitive zone should be renamed “no-wake zone” or “no-wake/low noise zone.”

Response: The zone formerly called “motorized sensitive waters zone” has been changed to “quiet/no-wake zone” in the plan.

Comment: Some people commented that the National Park Service should not ban motorboats from Isle Royale. One person expressed the concern that ferry service could be discontinued, preventing people from visiting the island. Others commented that boats provide access for those who can’t hike: the elderly, the disabled, and the very young.

Response: The proposed action does not ban motorboats from the park and does maintain ferry service. Proposed changes to motorboat use will not significantly change accessibility for those who cannot hike.

Comment: Motorboat engine technology has advanced in recent years, resulting in much cleaner and quieter engines. Engines using old technology are frequently a source of considerable water, air, and noise pollution. Engines that pollute the air and water should be banned from the park or phased out over time.

Response: The National Park Service believes that it is not reasonable or practical to establish boat powerplant requirements in the park that would differ from requirements in effect throughout the rest of Lake Superior in both Michigan and Minnesota.

Authority for setting engine emission standards rests principally with the Environmental Protection Agency, which has already promulgated new emission standards that manufacturers must meet by shortly after the turn of the century. New two-stroke engine technology, such as Evinrudes’s FICHT fuel injection, already meets the EPA standards. Engines using this new technology are on the market.

The National Park Service believes that these developments will result in the phaseout of older engines that do not meet the more stringent emission standards. The National Park Service will set an example by converting to the new engines as part of its marine engine replacement program. Public education and interpretive programs will also be used to increase public awareness of this issue.

Comment: Many people commented that nonmotorized zones should be greatly expanded beyond those in the draft proposed action to improve wilderness values and provide areas without the sounds and sights of motors. Many commenters suggested that specific bays and coves, or parts thereof, should be zoned nonmotorized (examples include Duncan Bay, Tobin Harbor, Robinson Bay, Moskey Basin, Lane Cove, and Brady Cove). More comprehensive suggestions, such as creating a buffer or transition zone (no motors or low noise) around wilderness land, or designating half the island's sheltered waters as nonmotorized, were also received.

Response: Motorboats are not permitted in the inland lakes of Isle Royale, as these areas are designated wilderness. Lake Superior waters were not included in the wilderness designation. Congress intended that motorboat use continue in the park. Because of the nature of Lake Superior, it would be unreasonable and dangerous to require boaters to anchor out for the night around the island without the protection of coves and harbors.

Instead of expanding nonmotorized zones, the plan has been revised to greatly expand quiet/no-wake zones, which will result in decreased noise, decreased wake effects on shoreline resources (including loon nests), and reduced wake impacts on canoers and kayakers. These expanded zones should provide the opportunity to experience the park in an environment more conducive to quiet and escape from modern intrusions. The expectation of not seeing motorboats is contrary to the concept of a maritime national park.

Comment: Some bays and harbors in Lake Superior should be designated as nonmotorized areas to provide a scientific control for comparison to motorized areas to determine effects on water quality, wildlife, etc.

Response: The National Park Service agrees that designating nonmotorized areas would provide some opportunity for future comparative studies of contaminant levels in motorized vs. nonmotorized Lake Superior waters, but due to the flow and interchange of water, no bays could serve as absolute control sites. Even without officially designated nonmotorized zones, the National Park Service can temporarily restrict use of some small bays or coves administratively to conduct this type of research. The plan has been modified to call for such research.

Comment: Some commenters suggested that the National Park Service permit sailboats in nonmotorized waters zones (at no-wake speeds and when wind conditions render navigation under sail impossible) since their auxiliary motors are not the primary means of propulsion. Someone suggested that sail-powered watercraft without auxiliary motors should be allowed in nonmotorized zones.

Response: The areas zoned as nonmotorized in the draft plan have been changed to quiet/no-wake zones (formerly called motorized sensitive zones). Sailboats would be permitted in these zones and in all Lake Superior waters in the park.

Comment: Visitor surveys indicate that sailboaters differ from other powerboaters in that they consider experiences such as tranquillity and solitude and nonmotorized water activities more important. They also perceive motorboat noise in narrow harbors and bays to be more of a problem (see *Draft General Management Plan/Environmental Impact Statement* p. 86). Thus, the National Park Service should consider designating some waters deep enough for cruising sailing craft to use as anchorages and nonmotorized water zones so sailors can find the quiet and solitude they seek.

Response: The proposed action has been revised. Quiet/no-wake zones (formerly called motorized sensitive zones) have been expanded, and the nonmotorized zones have been eliminated, so sailboats will have access to all Lake Superior waters. Expansion of quiet/no-wake zones will increase opportunities for tranquillity and quiet for motorized craft throughout the park. Parkwide noise restrictions called for in the plan will enhance and preserve quiet in narrow harbors and bays and will provide tranquillity and quiet for sailboats at anchor in these locations.

Comment: Concern was expressed that motorboaters will not comply with the proposed nonmotorized and quiet/no-wake zones. Commenters also suggested that quiet/no-wake zones and nonmotorized zones must be backed up with funding and a strong commitment to user education and enforcement.

Response: Nonmotorized zones have been eliminated from the proposed plan. Experience has shown that the vast majority of park users obey park rules and regulations. Violations of such rules and regulations are handled according to federal law. Current park funding requests include both education/interpretation and marine patrol.

Comment: Concern was expressed that the proposal to limit the innermost portion of McCargoe Cove to nonmotorized traffic would unduly restrict access to one of the most secure anchorages along the north shore of the island. This anchorage is especially important during southerly winds. Anchoring adjacent to the new proposed dock would permit too little swing room. It was suggested that the National Park Service consider providing mooring buoys in this area to increase safe anchorage.

Response: McCargoe Cove has been changed to a quiet/no-wake zone, where sailboats and other boats are permitted. Thus anchoring opportunities in this areas will not change as the result of the plan.

Comment: A variety of alternative suggestions for managing McCargoe Cove were received. Examples include: zoning the entire cove motorized sensitive (quiet/no-wake); opening the cove to motorboats for overnight anchorages only; making the cove quiet/no-wake during the day and nonmotorized at night.

Response: Zoning the cove for quiet/no-wake, combined with relocation of the dock closer to the mouth of the cove should meet goals for increased quiet at McCargoe Cove. (Also see response immediately above.)

Comment: The National Park Service work boats and the seaplane are the worst offenders in terms of noise pollution.

Response: The seaplane is a reasonable alternative for those seeking access to the island. It does not fly over the main portion of the island but instead follows the shoreline. Landings and takeoffs are limited to designated areas in Tobin Harbor near Rock Harbor and Washington Harbor near Windigo. Low altitude plane flights over the island will not increase in the future, as the proposed action states that scenic overflights are inconsistent with the wilderness character of the park. When the park workboats are replaced, the National Park Service will investigate options for quieter vessels and purchase them if they meet park requirements.

Comment: Safe harbors are needed in bad weather. Nonmotorized zones could endanger the lives of powerboaters by making harbors of refuge off-limits. One person commented that the NPS response that nonmotorized zones can be used for harbors of refuge in bad weather is unworkable because the

decision to use the harbor has to be left to the captain, who has to consider future weather and crew conditions.

Response: The proposed action has been modified — it no longer includes nonmotorized zones. Thus, concern about what weather conditions warrant use of nonmotorized zones should no longer be an issue.

Comment: Consider providing mooring buoys to give boaters alternatives to anchoring out or tying up to a dock.

Response: Self-sufficiency is a way of life on Isle Royale (see the first park emphasis statement in the plan). Mooring buoys would affect seasonal sailors/motorboaters who already anchor out without mooring buoys. Moorings can concentrate visitors in certain areas, causing crowding, decreasing opportunities for solitude, and impacting the natural scenic beauty. Vessels not self-contained using mooring buoys increase sanitary and health concerns. In addition, mooring buoys increase the maintenance workload and potential liability for the park.

Comment: Are any motorized vehicles permitted on inland waters?

Response: Motorized vehicles are not permitted on inland waters, as these areas are designated wilderness.

Comment: Why is the NPS proposing to keep boaters out of two nonwilderness areas (Siskiwit and McCargoe Cove)?

Response: The proposal has been modified to eliminate nonmotorized zones. Legislated wilderness applies to certain land and inland lakes portions of the park but not to Lake Superior waters (see the Wilderness Status map in the draft plan for details). Boaters, like all Isle Royale visitors, are welcome to enter both designated wilderness and nonwilderness areas of the park, provided that they observe applicable laws and regulations. In designated wilderness mechanized equipment such as motors must be left behind. Boaters may access the land portion by hiking, paddling, tying to shore, or using small auxiliary craft.

Comment: The *General Management Plan* should include a ban on the use of jet skis.

Response: The *General Management Plan / Environmental Impact Statement* bans jet skis at Isle Royale National Park.

Docks

Comment: Some people commented that it would be wasteful to spend money to remove docks that have any expected use life remaining and build new ones in new locations. Others said the plan should call for installation of new docks prior to elimination or closure of other docks.

Response: All four docks proposed for removal (Siskiwit, Three Mile, McCargoe, and Duncan Bay) would have to be replaced within the life of the plan, even if they were to remain. The intent of the plan is to not remove docks until replacements are constructed in the same general area (i.e., the Siskiwit Bay dock would not be removed until new docks were

available at Wright Island and Hay Bay. Similarly, the Duncan Bay dock would not be removed until the new dock at Crystal Cove was available for public use).

Comment: Some commenters said docks are needed for emergency response in the backcountry. One person suggested that cleats and bollards be removed from docks proposed for removal, but the docks be left in place for emergency evacuations until they deteriorate to the point that they must be removed.

Response: The docks proposed for removal are not needed for emergency evacuations or response. Park personnel routinely access shoreline areas lacking docks during both routine and emergency operations.

Comment: Keep the public dock at Threemile but make it day use only; it is popular with boaters, including lodge guests, who use it for accessing the Mount Franklin Trail.

Response: The dock at Three Mile is in poor condition and would have to be replaced if it were to remain. It is subject to ice damage, severe weather conditions, and boat wakes. Visitors wishing to access Mount Franklin could still reach it via the trail system.

Comment: Removing the Siskiwit Bay dock would eliminate trail access from the whole southwest end of the island.

Response: It is true that the closest docks (Windigo and Malone Bay) will be considerably farther from the southwestern portion of the island than the Siskiwit Bay dock. Boaters might choose, however, to anchor larger boats in Siskiwit Bay and take a dinghy ashore or beach smaller boats to take hikes or visit beaches in this area. There are several reasons for proposing the removal of the dock at Siskiwit Bay: (1) the dock and campground have become problematic for many users who are seeking quiet wilderness experiences and for whom the campground at Siskiwit is the only opportunity to camp on the shoreline of the big lake. This special opportunity is often compromised by noise from motorboats and occasional inappropriate boater behavior. Separation of uses at Siskiwit seems prudent and viable, given that there will be overnight use sites for motorized users at three nearby sites (Hay Bay, Wright Island, and Fishermans Home). Moving the campground is not a viable option because of site limitations such as topography and swampy areas and concerns about impacting wolf use areas; (2) the existing dock is only viable because of the artificial breakwall, which has disrupted the natural currents along the beach; (3) the dock is deteriorating and would require extensive repairs, even if it were to remain.

Comment: Isle Royale's wilderness legislation and legislative history indicate that Congress intended all existing docks to remain in place.

Response: The National Park Service disagrees with this assertion. The Senate originally recommended that the Isle Royale wilderness legislation contain the following special management language: ". . . the Secretary may, as he deems necessary, a) maintain existing boat docks for the safety of visitors and the protection of the wilderness resource, and construct new boat docks at relocated campsites in the event that present campsites need to be relocated . . .". Though this language was later deleted, the committee noted that the deletion was not an indication that maintaining and/or relocating boat docks was not permitted. The committee noted that "By removing the management language from the legislation the Committee seeks to separate the two functions of designation and administration." In other

words, the committee sought to leave such management decisions to the secretary of the interior and the National Park Service.

Comment: Every dock is a safety outlet for powerboats (including sailboats) in severe weather and no docks should be removed. One person commented that the Siskiwit dock is the only dock on the island's south side that gives good protection from storms between Windigo and Chippewa Harbor.

Response: Lake Superior can be dangerous at times, and while docks generally provide shelter from storms, so do protected bays, coves, and lee sides of islands. Each dock or other location offers advantages and disadvantages depending on wind direction. Between Windigo and Chippewa Harbor boaters will have a choice of several sheltered locations, including Hay Bay, Wright Island, Malone Bay, and Fishermans Home. Siskiwit is difficult to approach in a northeast wind. Some of the alternative sites offer better approaches and shelter during such conditions.

Comment: Any docks installed to compensate for the removal of docks in other areas should be at least as long as the removed docks, should offer equally good protection from storms, have water at least as deep, and be as easy to access by motorboat.

Response: All proposed docks are in areas that have been historically used and are in protected areas with adequate water depth. Dock length will be consistent with the historic scene. Longer docks outside of developed areas will not be considered, as they may result in crowding and associated noise and reduce opportunities for solitude.

Comment: Restore a dock at Todd Harbor and schedule the Voyageur to stop there again. Todd Harbor is big enough for the entire mix of visitors as long as they aren't right next to each other and respect each other's version of the wilderness experience.

Response: There is a dock at Todd Harbor. The National Park Service considered this idea during formulation of alternatives but decided against this action to avoid increasing use pressure on the Minong Trail, which is zoned primitive.

Comment: The *General Management Plan* should specify that the National Park Service will continue to evaluate docking options and continue to remove docks or relocate them so that boater/hiker interactions will be minimized. The plan should be only a starting point from which additional changes can be made.

Response: General management plans are intended to be long-term general guidance documents. It is not anticipated that decisions made in these plans would continue to evolve over the life of the plan. Changes to general management plans can be made, but they require a formal amendment process that includes public input. Because docks at Isle Royale are the major points of park access for most visitors, their general numbers and locations have been specified in this plan. These decisions are not expected to evolve over the 15-20-year life of the plan. While some separation of motorized and nonmotorized uses is accomplished by the proposed plan, minimizing boater/hiker interactions is not necessarily a goal.

Carrying Capacity

Note to readers: also see the Carrying Capacity section under the heading "Comments with Detail beyond the Scope of the *General Management Plan*"

Comment: Comments were received expressing concern about increasing numbers of powerboats and their effects on the island's environment. The following question and suggestions were included in the comments: What will be done if private motorboat use continues to increase? Consider the following actions to limit boat use: limit the number of rented boats with outboard motors, stop bringing small powerboats over on the *Ranger III*, stop selling fuel for boats except for emergencies or for rented boats.

Response: The draft plan (pages 26 and 28) refers to the NPS' legal requirement to address carrying capacity issues and to describe the visitor experience and resource protection (VERP) implementation plan that will be prepared following completion of the *Final General Management Plan /Environmental Impact Statement*. The VERP process has been developed by the National Park Service to address issues related to increases in visitation and use. Researchers have been collecting survey data from Isle Royale visitors to determine how crowded visitors feel and under what conditions visitors might feel too crowded in the future. Similarly, resource conditions are being examined to try to determine when visitor use levels result in unacceptable resource impacts. If the number of motorboaters (or other users) at Isle Royale increases to the point that crowding becomes a problem, visitors' experiences are compromised, or impacts on resources become unacceptable, management actions such as permit or reservation systems may be implemented. The public will have an opportunity to comment on the VERP implementation plan prior to its approval.

Comment: Several comments were received about reservation systems. Some were opposed to any kind of reservation system for Isle Royale; others supported the idea of reservations. Some people had specific suggestions. Some suggested that those who come to the island in private boats should have first priority. Others suggested that a first-come, first-served reservation system would be fairest.

Response: A reservation system may be needed at some point to keep use levels consistent with positive visitor experiences and resource protection. It is not within the scope of the general management plan, however, to decide the details of a reservation system. If a reservation system is needed in the future, different options would be carefully evaluated before one was chosen.

Comment: No consideration should be given to visitor limits. The sheer remoteness of the island provides more than adequate visitor controls.

Response: As noted above, the NPS is required by law to address the issue of carrying capacity in all units of the national park system. Despite the remoteness of the island, visitation has continued to increase over time. Some visitors already complain that campsites are crowded and that wilderness experiences are being compromised. If this trend continues, some limits on visitor numbers may be necessary to maintain visitor experience and resource protection objectives established by the *General Management Plan*.

Comment: Much of the primitive zone designations have been given to trails that already see less use. The National Park Service should consider designating some others that currently experience more use as primitive, such as the Lake Desor trail and the Feldtmann Lake trail. (The ecosystems are different in these two areas and need protection).

Response: The Lake Desor trail (assumed to be the Greenstone Ridge Trail) is part of the main route between Windigo and Rock Harbor. The National Park Service feels that it is appropriate for this corridor and the Feldtmann Lake trail to be zoned backcountry to

accommodate moderate use and groups of up to ten people. The backcountry designation will not preclude protection of these areas.

Comment: Isle Royale is like a city park already; which will win out — the visitors or the resources?

Response: As described above, the VERP process is intended to consider use levels that are consistent with resource protection objectives in different areas of the park. Part of the VERP implementation process is to identify resource and visitor experience indicators that ensure that visitor use is consistent with resource protection. In this way, visitors and resources both win.

Rock Harbor Lodge and Concessions

Comment: Elimination of the motel units at Rock Harbor would preclude the elderly, the disabled, and the very young from visiting Isle Royale.

Response: The draft plan acknowledges the need for some overnight accommodations for visitors who do not want to camp or who are unable to camp or backpack on the island. The plan calls for a range of different types of accessible overnight accommodations at Rock Harbor.

Comment: Many suggestions were received regarding options for the Rock Harbor motel units (rather than removing them), including: convert them to housekeeping units or to spartan, low-priced motel rooms without linens or maid service, convert them to housing for park employees, or remove two of the motel units and run the other two at higher capacity.

Response: The National Park Service agrees that possible adaptive use of the motel buildings should be explored in combination with or in place of new construction. Architectural and engineering assistance will be enlisted to explore options. This work will occur in advance of the current concessions contract expiration and negotiation of a new contract in 2002. The *Draft General Management Plan / Environmental Impact Statement* has been revised to reflect this change, and criteria were developed to guide the decision-making process (see the concessions section in the proposed action).

Comment: Concern was expressed for the areas left by removal of the lodge units.

Response: If the lodge units are removed, the sites will be rehabilitated and revegetated with native species (see p. 24 of the draft plan). The intent is to restore the areas over time to as close to their original condition as possible. Only native plants and seed sources near the disturbed site would be used in rehabilitation and revegetation.

Comment: Why are there plans to fix up the motel units if the ultimate plan is to remove them?

Response: The plan has been modified. Depending on the feasibility of retrofitting the motel buildings to create accommodations more in keeping with the goals for the Rock Harbor area, the buildings may be retrofitted and remain in place. In any case, health, safety, and accessibility standards must be met and the buildings must be maintained while the motel units are in operation.

Comment: One person suggested that the concessioner should do laundry in Houghton rather than on the island. Another suggested that the public laundry at Rock Harbor does not constitute a large energy and wastewater load compared to NPS-owned and operated laundry machines at Rock Harbor and Mott Island.

Response: Some of the concessioners' commercial laundry is transported to Houghton. Because concession and NPS employees live on the island for 3-6 months per year, laundry facilities are considered essential. For visitors who stay on the island for several days, laundry service is not essential.

Comment: There will not be enough overnight units if the motel structures are removed.

Response: There will be some loss of overnight capacity resulting from the removal or modification of the motel buildings. However, given the current low occupancy rate of the motel units and the intended addition of some housekeeping units and/or rustic cabins, the total reduction in overnight capacity will not be substantial. The National Park Service considers some reduction reasonable in light of reduced resource and visual impacts, a more sustainable design, and units that meet code and Americans with Disabilities Act (ADA) requirements.

Comment: Despite the economics involved, the fees the concessioner must pay to the National Park Service must be kept within reason so that prices paid by visitors remain affordable. Otherwise the national parks become, in effect, costly private country clubs.

Response: The National Park Service agrees that it is desirable to keep overnight accommodations affordable to visitors. This is one reason that the *Draft General Management Plan /Environmental Impact Statement* calls for additional annual funding of \$400,000 to subsidize the concessioner's utility costs. If this base increase is obtained, utility charges to the concessioner will be significantly reduced, enabling the concessioner to reduce rates charged to the public. Without the increase, utility charges to the concessioner will have to be raised, as will resulting rates to the public (see appendix C for a more detailed discussion).

Comment: The National Park Service should think about establishing a lodge and dining facilities at Windigo also.

Response: Alternative B explores the concept of adding lodging for visitors at the west end of the island. The majority of public comment has opposed additional development on the island.

Comment: The National Park Service should take measures beyond those proposed to remove unnecessary concessions and services from the park. This would encourage provision of these services in the settled gateway communities and lessen the visual and actual impacts of development in the park.

Response: Discontinuing all concession services except ferry transportation to and from the island was considered in alternative C. It is not feasible for gateway communities to provide the concession services that are available on the island, such as meal service, overnight accommodations, water taxi service, canoe and boat rentals, and fuel sales.

Comment: Clarify in the final plan that the number of lodge guests is dropping as a direct result of the M .V. *Ranger III* schedule being reduced from three to two round trips per week.

Response: The schedule for the *Ranger III* was reduced from 3 to 2 trips per week more than 25 years ago. After that, the number of passengers carried each year increased steadily with only minor fluctuations downward in years corresponding to increased gasoline prices nationwide or increases in other costs directly associated with a visit to the island, such as lodging costs. Adding an additional trip per week would increase NPS operating costs for the ship by approximately \$75,000 per year (for additional crew members, overtime pay, fuel costs, etc.). As only a few *Ranger III* trips per year are full to capacity (and the seaplane and other ferries are not usually full), there is no reason to expect that the addition of another round trip per week would increase guest numbers appreciably.

Comment: One commenter questioned the figures on the actual costs of utilities at Rock Harbor and Windigo and wondered whether the National Park Service has made any attempt to reduce the costs through contracted services, better trained personnel, or any other means. Another person said the draft plan does not appear to consider options to enhance the lodge's image and/or its use, and submitted the following: (1) could overnight stays be increased at the lodge/housekeeping units by relocating the lodge in an area where more trails are available (i.e., closer to the middle of the island)? and (2) when more visitors used the lodge in the past, was there better trail access by boat or were other amenities available to interest lodge guests? Perhaps lodge use could be increased by establishing convenient, economical water taxi schedules to take lodge guests for day hikes.

Response: Contracted services would not result in significant savings because approximately the same staff with the same level of expertise would be needed. The cost of fuel and other operating supplies would not be different, and the environmental protection regulations would be the same. Better trained employees might be conceptually possible but would not reduce costs because the same practices would be required by law and regulation. Relocation of the lodge would affect wilderness values, would impact new areas, and would be prohibitively expensive. Greater lodge use could increase the profitability for the concessioner to some degree, but major rehabilitation of the infrastructure would still be required at the same cost. None of these options would meet the goals of reducing visual impacts and achieving a more environmentally sustainable operation. As for the water taxi, it serves many areas already, and it would not be economical for it to operate on a regular schedule, rather than on demand.

Comment: Regarding the concession at Rock Harbor, has the National Park Service made an attempt to implement the provision in Special Directive 83-2 (revised) that says in special instances "the new policy has a mechanism for exceptions when additional utility costs will cause the prices of visitor goods and services to be so high as to impair their marketability and seriously jeopardize the economic viability of the concessioner?" This provision should be mentioned in the plan.

Response: The *Draft General Management Plan / Environmental Impact Statement* recognizes that Special Directive 83-2 permits the National Park Service to subsidize concessioner utility costs under exceptional circumstances (see appendix C). This is why the plan calls for new funding to rehabilitate the utility system infrastructure and to subsidize the annual utility operating costs. If this funding is not granted, there is no viable option to having the concessioner pay. It is not appropriate or desirable for the park to subsidize concession utility costs at the expense of other priority programs, such as resource management and services affecting a far greater percentage of park visitors. Additionally, the National Park Service has no obligation to provide economically viable concession operations. The National

Park Service does have the obligation not to allow a concession to operate when it is known that the operation is not viable.

Comment: Rock Harbor lodge is as much a part of the cultural history of the island as the fisheries, lighthouses, and mines. There is no evidence in the plan of an attempt to keep, further develop, or preserve structures on the shore of Rock Harbor where the original guest house is located. The only reference is to tear down what is there now and build something else, away from the shoreline, that will have no resemblance to a lodge that has been a part of the island culture since long before the island was designated a national park.

Response: In the proposed plan, the guest house (constructed 1922-24) and the Spruces cabin (1911) will be retained. The lodge motel units, constructed in 1956 and 1962 by the National Park Service, are not historic structures, nor are they significant elements of the historic Rock Harbor lodge. Before the island was designated a national park, the Rock Harbor lodge and other resorts around the island were generally made up of a main lodge building and numerous smaller guest cabins. Retention of the guest house and the only remaining guest cabin, Spruces, is consistent with the history of the Rock Harbor lodge area.

Comment: The *Draft General Management Plan / Environmental Impact Statement* discusses the negative visual impact of the Rock Harbor lodge. But a five minute stroll to the west along Rock or Tobin Harbor trails puts visitors beyond sight of the lodge development.

Response: The primary aesthetic concern with the Rock Harbor motel buildings is the intrusion on the scenic view from the water. The proximity of the structures to the shoreline and the architectural style of the buildings make them particularly obtrusive.

Use Conflict / Separation of Uses

Comment: Several people said that conflicts between user groups and separation of uses was given undue attention in the plan. Some said there would be less need to separate users if visitors were informed in advance about what to expect on the island and if users were more aware of and respectful of others' needs and expectations. Someone suggested that the National Park Service should consider the use of campground hosts to help reduce conflicts between user groups at campgrounds. Others pointed out that boaters give aid to hikers and paddlers who are injured or in trouble, share food, and provide transportation.

Response: The plan text has been revised to clarify the distinction between separating **uses** and separating **users**. It is not the intent of the plan to separate users; the National Park Service recognizes that many people who motorboat also hike and/or paddle and that many interactions between types of users are positive. The goal of the plan is to separate uses in a few areas of the park to ensure a variety of experience opportunities and to respond to many visitors who are requesting respite from motorboat noise. All park users are welcome to use all areas in the park, so long as they do so in ways consistent with visitor experience and resource protection objectives of the area. The attention paid to the issue of separating uses in the plan is warranted by the amount of public comment requesting some separation of motorized and nonmotorized uses. Though the National Park Service agrees that user education and increased awareness will help to prevent problem situations, it is also true that visitors come to Isle Royale with the expectation of wilderness, which is a reasonable expectation because 99% of the land base is statutory wilderness. The wilderness designation

for Isle Royale requires the National Park Service to manage for wilderness, rather than inform the visitors that they should lower their expectations for a wilderness experience.

Comment: The notion that hikers' and boaters' use of the island should be separated, with hiking access to waterfronts limited and boaters' access by foot to the inner island restricted makes no sense. Many boaters come to the island to explore its interior and hike its trails, while hikers walking the interior for hours look forward to the waterfront contact that the trails provide at key locations.

Response: There is no attempt in the plan to limit hikers' access to waterfront areas or to limit boaters' access by foot to the inner island. There are some actions in the plan (such as relocating docks) that would enhance separation of motorized from nonmotorized uses (see also the response above).

Comment: Several people suggested that the National Park Service should build new dockless campsites or campgrounds for hikers and paddlers as an alternative to removing docks at some campgrounds. Some said campsites should be moved away from boating harbors or docks to separate user groups. One commenter said that the National Park Service should create some inexpensive, easy to maintain, widely spread out primitive individual campsites like those in the Boundary Waters Canoe Area. Another suggested that more isolated campsites with good views should be built. Others argued that development of new campgrounds and trails and replacement of lodging facilities should be limited to prevent fragmentation of wildlife habitat so that wildlife would have large areas undisturbed by human activity.

Response: The National Park Service considered the construction of several smaller campgrounds around the island but rejected this idea due to concerns about cumulative effects of additional development. Adding new developments, even small primitive campsites, into presently unused areas would further fragment available wildlife habitat. In general, wildlife would be displaced from the area around any new developments. The National Park Service considers these impacts unacceptable. Cross-country camping is still an option for those individuals seeking a primitive camping experience.

Comment: Isle Royale's problem with visitor conflicts may be largely the structure of the established campgrounds: (1) trail shelters/campsites within 100 feet of each other, (2) insufficient shelters/campsites during peak visitation, (3) desirable shoreline campsites used by hikers, paddlers, sailboaters, and powerboaters.

Response: The configuration and number of campsites in the park has evolved over the life of the park, largely in response to growth in demand for campsites. This has resulted in more (or closer) sites in some areas than would be optimal. Topography, soils, and wetlands are common design constraints. Increasing the number of sites to accommodate peak use would result in greater resource impacts caused by facilities that would receive only occasional use. When use conflicts occur, they are related more to insensitive or rude behavior and noise than campground design, so optimal campground layouts would not prevent them.

Comment: Rangers should be stationed at points of high visitor concentration. For example, a ranger should be stationed in McCargoe Cove rather than Amygdaloid Island, and a small ranger station should be constructed at Daisy Farm.

Response: There is a campground host cabin at Daisy Farm. The National Park Service believes that visitor conflict issues are best resolved through proper facility design and location, public education, and ranger patrols rather than through onsite supervision of visitor

use. The constant presence of NPS employees in campgrounds would diminish the wilderness experience for all users. An NPS employee was stationed at McCargoe Cove for two summers. While this resolved most conflict issues at McCargoe, it displaced such problems to unstaffed campgrounds.

Trails and Campgrounds

Comment: What is the rationale for removing the hiking trail connection from Chippewa Harbor to the east end of Lake Richie? This action eliminates a cross-island option for hikers. Some hikers will still go cross-country, however, and a trail concentrates and limits hiking impacts. Removing the trail connection also prevents motorboaters from accessing the rest of the trail system from this point.

Response: The portage trail connection from Chippewa Harbor to Lake Richie will remain in place to provide access to the lake for paddlers and boaters. Chippewa Harbor has become a very popular area and is heavily used by paddlers, boaters, and hikers. Removal of the trail segment will reduce crowding and use pressure on this fragile resource area. The campground is primarily situated on rock, and expansion of the campground would encroach on an area of archeological significance. Further, the closing of the trail as a route from Moskey Basin or as a cross-country trail will allow some separation of uses. It is true that motorboaters and hikers will have to access the island's trail system from another point. However, the cross-island canoe route will remain open, with Chippewa Harbor continuing to serve as a destination or point of embarkation for this group of island visitors.

Comment: Isle Royale lacks sufficient trails along the Lake Superior shoreline. The lakeside hiking trails that led from Daisy Farm to Moskey Basin in the 1970s should be replaced.

Response: The following trails follow the Lake Superior shoreline for at least part of their length: the Tobin Harbor trail from Rock Harbor lodge to the Mount Franklin trail, the Rock Harbor trail from Rock Harbor lodge to Daisy Farm, the Scoville Point trail, a portion of the Feldtmann Lake trail near Windigo, the Island Mine trail along Siskiwit Bay, and a portion of the east Hugginin Cove trail.

The shoreside trail between Daisy Farm and Moskey Basin was relocated primarily because it was in a very wet area. There are two ways to deal with trails crossing wet areas: bridging and trail rerouting. Trail rerouting, where an alternative route is possible, is the more sustainable choice because of reduced impacts on wetlands and reduced maintenance costs over the long term. Contributing to the decision to reroute the trail were visitor complaints about hikers and boaters seeing and hearing each other along the trail.

Comment: Several commenters suggested creating new trails, such as (1) a day use trail from the Siskiwit Bay campground toward Point Houghton, (2) a trail between Moskey Basin and the Rock Harbor Lighthouse on the Rock Harbor side, (3) from the Rock Harbor lighthouse to the Chippewa Harbor vicinity, and (4) from Malone Bay to the Island Mine trail. Reasons given for creating such trails included dispersing use and allowing visitors to visit points of interest without using a concessions-operated boat.

Response: Early in the planning process the team considered the option of creating additional trails on the island. In the end, these ideas were not included in the alternatives because of concerns about adding to the trail maintenance load, the need to avoid or bridge wet areas, and wildlife concerns related to introducing human activity into new areas of the island.

Regarding suggestion (1) in the comment above, wetlands and raptor nesting areas are a concern. For suggestions (2), (3), and (4) there are threatened and endangered species concerns (bald eagles and wolves).

Comment: One person suggested that backpackers should be allowed to camp in areas other than designated campsites, such as beside trails. Another commenter said a possible solution to conflicts between users at campgrounds would be to make hikers and paddlers aware that there are options to campgrounds (i.e., cross-country camping).

Response: The park does allow off-trail camping (cross-country camping) in certain areas of the park, and this use will continue. Special protective regulations apply to cross-country camping, and a special camping permit is required. Cross-country camping is intended for those who want to get away from park trails and established campgrounds. It is not intended as overflow or trailside camping. As long as there is a relatively low level of this type of camping, its impact to wildlife and vegetation will remain acceptably low.

Comment: I assume the Three Mile campsite would be off-limits to boaters.

Response: Boaters would be welcome to use this campsite but with the removal of the public dock, they would have to access it via the trail system or by beaching a small craft.

Comment: There should be some campsites established exclusively for sail and powerboaters, preferably on small islands, and for paddlers in more sheltered areas along the main island generally not accessible by hikers.

Response: The proposed plan will not reserve campgrounds or campsites exclusively for particular user groups. Instead, the means of access provided will largely determine who uses particular campgrounds.

Comment: Regarding the elimination of commercial kayak trips around the west end of the island, the plan says this would “help maintain isolated shorelines with opportunities for solitude.” Solitude for whom? The shorelines can’t be reached other than by boat (kayak). Won’t such trips just be relocated to the east end, thereby increasing the demand for already crowded campsites? Since these kayakers apparently distribute themselves away from developed campgrounds where conflicts exist, they should be congratulated rather than penalized.

Response: The intent is to provide areas where paddlers who are not traveling as part of a commercial trip can find solitude. This action will help prevent cumulative impacts from repeated use of specific areas in pristine zones.

Comment: The location of campsites on Lake Richie needs clarification. The Existing Conditions map shows campsites on the east and south ends of the lake, but the map for the proposed action shows no campsite on the south side of the lake and a “new” campsite on the north side of the lake, with no explanation of the change.

Response: The plan does not propose to relocate any campgrounds on Lake Richie. The campground in question is located at the end of a peninsula that extends out into lake on the north side. The campground symbol has been repositioned on the Existing Conditions map to more accurately reflect the location.

Comment: Consider increasing the number of small canoe/kayak sites along the Lake Superior shoreline. In particular, consider a paddler campsite in the vicinity of Blake Point; the campsites on either side of Blake Point (Merritt Lane and Duncan Narrows) are often full, and there are no other options in the area for sea kayakers, who cannot compete with motorboaters for shelters and campsites. If it is not possible to create a new campsite for resource reasons, another option would be to reserve a shelter or tent site at campgrounds on either side of Blake Point. A last option would be to create some kayak campsites in or near Rock Harbor.

Response: The proposed action has been modified to include the addition of one or two tent sites at Merrit Lane to improve opportunities for paddlers to camp in the area. Also, cross-country camping is allowed in certain locations in this area (a permit is required).

Wilderness

Comment: The *General Management Plan / Environmental Impact Statement* should include a wilderness designation plan and clearer indications of when areas recommended for wilderness will finally be managed as such.

Response: A wilderness and backcountry management plan is called for in the plan (see p. 28 of the draft). This plan will provide guidance on this topic and will be available for public review.

Comment: A large part of the unique wilderness experience that could be provided by Isle Royale as an island wilderness could include the wilderness shoreline looking out on waters also in wilderness condition. None of the alternatives described in the *Draft General Management Plan / Environmental Impact Statement* provide a shoreline that looks out on Lake Superior open waters without motorized boats. The most protective alternative would have most of the Isle Royale wilderness surrounded by nonmotorized waters. This alternative does not seem to have been considered. Less protective alternatives would also benefit from substantial portions of wilderness shoreline buffered by nonmotorized boating restrictions and were also not considered. Similarly, ferry boat routes could be moved further offshore; perhaps moved out of the channels between the main island and the offshore island. These alternatives were also not considered in the draft plan.

Response: Alternatives such as described here were not considered because they are not believed to be viable alternatives. As mentioned in several other responses, Congress intended that motorboat use be continued at Isle Royale, as it is a maritime park. Because of the nature of Lake Superior, it would be unreasonable and dangerous to require motorboaters to travel and anchor around the island without the protection of coves and harbors. Because of the length of the ferry trips to the island (it requires six hours or more to travel from Houghton, Michigan, or Grand Portage, Minnesota, to Rock Harbor) it would not be reasonable to expect the ferries to lengthen their trips even more by traversing the island far enough out to be unseen from the shore. The *Voyager* circumnavigates the island at most three times per week, the *Ranger III* makes the round trip twice per week, and the Isle Royale *Queen* comes straight in and out of Rock Harbor without circling the island; therefore, the majority of visitors do not see the ferries during most times of most days.

Comment: The draft states that potential wilderness additions will be managed like wilderness. In this regard, it is not clear that the ferry landings, shelters, docks, and campgrounds proposed for the frontcountry zone, wilderness portal zone, and backcountry zone are in keeping with the management of wilderness.

Response: In Senate hearings on the Isle Royale wilderness bill, language is included that indicates the intent to retain motorized boat access to the island. Included in the language is the continuance of “. . . the construction and maintenance of boat docks along the lakeshore as long as their purpose is for safety of visitors and the protection of the wilderness resource.” Further language reads, “The Committee understands that no significant expansion of boat dock numbers is anticipated, but that continued maintenance of these facilities is essential to the continued ease of access as well as the health and safety of the visitors.” The National Park Service believes that the ferry landings and docks, as called for in the various alternatives, are consistent with the intent of this language. The number of ferry landings is not increased in any of the alternatives. The number of docks in the various alternatives remains the same as existing conditions, is increased slightly, or, in alternatives B and C, is reduced.

“Relatively large campgrounds” would be permitted in frontcountry zones only when the zones are in nonwilderness (p.30). “Moderate-sized campgrounds,” including shelters, would be permitted in frontcountry and wilderness portal zones. In these staging areas, such campgrounds are deemed necessary for protection of resources because visitors are dropped off at these primary ferry stops (the only way to access these areas other than hiking or private boats) and often cannot disperse immediately to other areas. Established camping areas help limit impacts resulting from this “pulsed” visitation. No new shelters would be added in backcountry zones, but tent platforms may be provided as necessary to protect resources.

Comment: Wilderness management zones are unnecessary and probably violate the Wilderness Act. Planning that condones impairment or potential impairment of a wilderness area because of its proximity to human intrusions violates the Wilderness Act. The National Park Service should instead establish a good baseline for management decisions regarding recreational use, scope of development, and visitor facilities and services by setting goals through desired future conditions and adapting use patterns as new data becomes available through inventorying and monitoring.

Response: Park management prescriptions for visitor use and resource protection in different areas of the park (management zoning) is basic to good planning and is required by NPS planning policy. Zone descriptions are descriptions of desired future conditions. Zones that prescribe uses and resource conditions consistent with wilderness values are not in violation of wilderness law or management policy.

Cultural Resources Management and Interpretation

Comment: There is little attention given to monitoring the conditions of Isle Royale’s shipwrecks. It is not until Phase III (13-20 years out) that there is mention of setting standards and/or implementing any preservation policies or partnering for the shipwrecks.

Response: Cooperating with partners to set standards for and carry out preservation of shipwrecks is listed not under Phase III, but rather under “Actions to be Implemented on an Ongoing or As-Needed Basis” (see p. 144 of the draft plan). This means that such efforts could begin right away and continue throughout the life of the plan. Also, we have expanded the discussion of the Great Lakes Shipwreck Preservation Society and shipwreck documentation and stabilization in the plan so that readers can better understand the nature of shipwreck management.

Comment: There are no visitor statistics presented in the plan on the number of shipwreck divers that visit the island. Therefore, the National Park Service apparently has no means to estimate diver impact on shipwreck resources or to determine funding and staff needs to monitor, stabilize, and preserve the wrecks for future visitors.

Response: The park does have statistics on numbers of divers and numbers of dives. The plan does not include this information because no changes are proposed related to diving. Current monitoring indicates that there is no need to make any changes to diving practices on the island, but if future inventory and monitoring identify potential impacts, the park will take action as necessary to protect these resources.

Comment: Why is the cottage history not as important as some of the other stories? Interpretation of this part of Isle Royale's history is largely ignored in the plan.

Response: The National Park Service did not intend to overlook the interpretation of cottage history (people who have traditionally summered on the island in private dwellings). Two park emphasis statements have been revised to address the island's cottage history.

Comment: Modifications to the cottages (solar panels, water filtration systems, etc., for buildings adapted to administrative uses) are inconsistent with their preservation.

Response: Adaptive use is recognized as a means to preserve historic structures. Consultation with the State Historic Preservation Office and the Advisory Council on Historic Preservation (as required by section 106 of the National Historic Preservation Act) will ensure that all significant features of adaptively used historic structures will be either preserved or recorded.

Comment: Comments were received regarding former homesites on the island. Commenters said that remaining homesites are relics of a significant past culture and are of interest to visitors. Some said statements in the plan about using partnerships for preserving historic structures are not strong enough (draft text on p. 24 was cited as an example); the National Park Service should encourage partnerships with previous owners, lease holders, fishermen, and concerned people who develop preservation plans for specific sites. Other comments were more specifically related to the families who once owned the homesites. There was a suggestion that the plan address the issuance of permits to original families to use and maintain family homesteads (at the families' expense or with public donations) into the future. The park and public would benefit from preservation of the island's historic culture at very little expense, and the original families could maintain and preserve their ancestral heritage. Families could share cultural artifacts with the visiting public by putting them on display at the homesites.

Response: A cultural resource management plan will be completed after the *General Management Plan / Environmental Impact Statement* is finalized. This plan will address the future of the homesites/life lease sites. Decisions will be made on which homesites to maintain based on the criteria outlined on page 24 of the draft plan (wilderness status of the land, national register eligibility of the structures and sites, condition of the structures, importance to cultural landscapes, and suitability and potential for adaptive uses by the park.) After these decisions are made, partnership agreements will be sought to stabilize, maintain, and interpret the homesites. The original families will be eligible to participate in the partnerships. All agreements made will be consistent with NPS laws and policies.

Comment: The Wilderness Act of 1964 states "features of historical value may be present in wilderness areas." It further states that wilderness "is an area retaining its primeval character and influence, without permanent improvements or human habitation." Historic structures should be

allowed to remain on Johns Island (see p. 35 of the draft plan); new docks and tent platforms seem contradictory to the Wilderness Act.

Response: The cabin on Johns Island will be evaluated for retention or removal based on the criteria listed on page 24 of the draft and in the above response. Facilities such as tent platforms will only be used at campgrounds where needed for resource protection, which is consistent with NPS wilderness management. The Senate hearings on the Isle Royale wilderness bill provide for the continuance of “. . . the construction and maintenance of boat docks along the lakeshore as long as their purpose is for safety of visitors and the protection of the wilderness resource.”

Comment: The issues section of the plan says “There is no clear policy for the disposition of structures, grounds, and docks on the island following the expiration of life leases” (p. 5). In the proposed action section of the plan there is still no clear policy — it says life lease properties will be dealt with on a case-by-case basis (p. 24).

Response: The criteria by which individual cases will be decided are set forth in the *Draft General Management Plan / Environmental Impact Statement*. These criteria include information that will be provided by the ongoing cultural landscape inventory and update of the List of Classified Structures. Results are not yet available. A cultural resource management plan will be developed upon completion of the *General Management Plan* and will be available for public review. It will document decisions to remove or retain and maintain structures and sites. The decisions will be based on the criteria listed on page 24 of the draft plan. The results of ongoing studies will be used in the evaluation. After the decisions are made, partnership agreements will be sought to stabilize, maintain, and interpret the life lease properties. Family members of the original leaseholders will be eligible to participate in the partnerships. All agreements made will be consistent with NPS laws and policies.

Comment: Underwater archeological sites should be mapped (such a map should have been included in the plan) and motor use restrictions should be implemented to protect these archeological and cultural resources.

Response: A priority for the management of cultural resources in the proposed plan is completion of inventories and documentation of all archeological sites, both underwater and terrestrial (p. 24). The inventories will include areas of potential disturbance, such as campgrounds and popular boating spots. If impacts to archeological sites are determined through future monitoring, steps will be taken to limit the impacts, and (if necessary) the *General Management Plan* will be amended. Due to the sensitive nature of archeological sites, specific maps and site data are not made available to the public.

Comment: As the draft plan acknowledges, the Lake Superior fishes and fisheries are very significant resources and important components of the maritime park experience. Two suggestions related to the theme of Lake Superior fishes and fisheries are as follows: (1) a theme study and comparative analysis for the fishes and fisheries of Isle Royale to establish their national significance and provide a clearer direction for management and research and (2) a 5-year strategic management plan for the historic fisheries that includes options for adaptive use, site preservation and maintenance, interpretation, and sustainable funding and financing.

Response: The National Park Service agrees that a study of the fishery resources at Isle Royale, for the purposes of establishing national significance and to provide clear direction

for research and management, is appropriate; a fisheries management plan is called for in the *Draft General Management Plan / Environmental Impact Statement* (see p. 29). A priority for cultural resource management will be completion of inventory and documentation of cultural landscapes, which will include historic fishery sites (see p. 24 of the draft). Structures at the historic fisheries were included in the List of Classified Structures update and are being evaluated for national register eligibility and historical significance. An ethnographic study of commercial fishing on Isle Royale was funded in 1998 and will greatly help to increase knowledge of the fishing culture on Isle Royale. Management plans for the fishery sites proposed to be used as campgrounds (Fishermans Home, Wright Island, and Crystal Cove) will be developed upon completion of the *General Management Plan* and will include options and strategies for adaptive use, site preservation and maintenance, interpretation, and partnerships for funding, as suggested.

Wildlife / Natural Resource Protection

Comment: Commenters suggested that nonmotorized zones be increased to protect loon populations and other nesting waterbirds. One commenter asked about what scientific evidence is available to suggest that loons are being negatively affected by boat wakes in Pickerel Cove.

Response: Input from biologists who have worked with Isle Royale waterbirds was sought by the planning team throughout the planning process. Their recommendations to protect such species were incorporated into the proposed action (as revised); the biologists have commented that the quiet/no-wake zones in the plan do a good job of minimizing impacts to waterbirds such as loons, while still providing safe harbor and permitting motorboat use in Lake Superior waters of the park. Evidence that loon nests can be affected by boat wakes is based on nest observations; these effects are not specific to Pickerel Cove.

Comment: One person said that the National Park Service should let the Michigan Department of Natural Resources manage the fisheries at Isle Royale. Another said that the National Park Service should work closely with the Michigan Department of Natural Resources and statewide sportsmens' groups to foster a positive relationship as stewards of island wildlife resources.

Response: By law, responsibility for the management of the inland lakes fishery and terrestrial wildlife rests with the National Park Service. Primary responsibility for the management of the Lake Superior fishery in the park rests with the Michigan Department of Natural Resources. The park has and will continue to work closely with the state, the U.S. Fish and Wildlife Service, Indian tribes, and other stakeholders to manage and protect this fishery. The plan calls for the development of a fisheries management plan (see page 29 of *Draft General Management Plan / Environmental Impact Statement*).

Comment: Has the carrying capacity of the island for animals been studied? Too many animals can harm the vegetation. Hunting or relocation of animals should be considered to reduce overpopulation of moose and other species.

Response: Nature has its own way of managing wildlife; NPS policy will remain constant — to intervene as little as possible. Harm to vegetation is a value judgment; overpopulation of moose has occurred in the past at Isle Royale and will probably occur again. The significant moose population crash of 1996 (due to the severe winter, parasites, and lack of food) has removed any current concerns about overpopulation. Relocation of animals, particularly from

an area as remote as Isle Royale, is very expensive and not always successful. Hunting in national parks is prohibited by law unless specifically authorized by the enabling legislation.

Comment: The plan should address pollution emanating from Thunder Bay and Duluth.

Response: The National Park Service believes that it will be most effective in addressing pollution from such areas by cooperating in regional efforts designed to tackle such issues. Examples include the Great Lakes Regional Air Partnership and the Binational Program to Protect and Restore the Lake Superior Basin. According to the plan (p. 23), the National Park Service will investigate ways to contribute to and benefit from regional ecosystem management and protection. Also, there is ongoing research at Isle Royale examining this issue.

Comment: Because natural resource inventories for all species have not been completed, is it possible that new information about natural resources could result in changes to the *General Management Plan*?

Response: Yes, depending on the nature of the information and any adjustments, a general management plan amendment may or may not be required.

Comment: The language describing frontcountry zones suggests that the proposed action would negatively affect bogs, which are very fragile plant communities.

Response: Text in the proposed action (p. 35) does say that frontcountry zones would be near developed areas and where there are other natural or cultural features of special interest, such as bogs. This statement must be considered in the context of the general description for frontcountry (p. 30), however, which addresses the potential for negative impacts to bogs and other resources. "Visitors, sites, and trails would be intensively managed in the frontcountry zone to ensure resource protection and visitor safety The zone would not be near sensitive natural or cultural resources if such resources could not be adequately protected."

Comment: The National Park Service should undertake the designation of all Lake Superior waters within the park as Outstanding National Resource Waters under the federal Clean Water Act where increased loading of persistent bioaccumulative toxics from all sources would be prohibited.

Response: The National Park Service has recommended that all national park waters in the state of Michigan be designated Outstanding National Resource Waters. This recommendation has been forwarded to the state of Michigan, which has responsibility for the designation.

Comment: The *General Management Plan* should include a clearly articulated desired future condition for all habitats and ecosystems in the park to provide direction for developing long-term ecological protection strategies.

Response: Because of the general nature of these plans, descriptions of desired future conditions are also general. Because of Isle Royale's wilderness status, the range of desired conditions in different habitats or ecosystems is not broad. This is reflected in the large areas of the island that are zoned as "pristine." More detailed desired future conditions will be included in the revision of the park's resources management plan and wilderness management plan.

Comment: Mollusks and snails should be added to the list of taxa in need of inventory. Information for the state of Michigan indicates that Isle Royale lacks these inventories.

Response: Mollusks and snails have been added to the list in the *General Management*

Comment: There is also the potential for short-term water pollution due to spills of toxic materials around Lake Superior and inside park boundaries” (p. 5 of the draft plan). Spills of what and where?

Response: There could be accidental releases of petroleum products (gasoline, diesel fuel, lubricating fluids, etc.) that are used to operate boats. Accidents could also occur because the products are transported as bulk cargo or stored in NPS land-based storage facilities, are contained on commercial vessels traversing shipping lanes, and are transported on visitors’ boats. Gasoline and/or diesel fuel are stored in bulk at Rock Harbor, Mott Island, Malone Bay, Windigo, and Amygdaloid Island. Sewage sludge is pumped from holding tanks at NPS developed areas and is transported for disposal on the mainland. Regular inspections of NPS vessels, particularly those transporting petroleum products as bulk cargo and of NPS shore-based storage facilities are conducted at least annually. U.S. Coast Guard-approved spill prevention and contingency (response) plans are in place and address potentials for spills and actions to be taken should such an event occur. Because the National Park Service has no authority to control commercial vessel activity on Lake Superior and because use of petroleum products is necessary to accomplish park operations, risk of accidental release cannot totally be eliminated.

Comment: The provision of diesel fuel, gasoline, and pumpout stations for public use increases the potential of water pollution while further encouraging uses of the Isle Royale wilderness that is perhaps not in keeping with the intent of the wilderness designation by Congress. A combination of reducing the need for importing and storing diesel fuel and gasoline and upgrading the infrastructure would make an alternative more protective of the environment. Several commenters said that the *General Management Plan* should include a plan to reduce or phase out fuel transportation to, and sales of fuel at, the island.

Response: Alternative C would eliminate fuel sales at the island. However, because access to the park is possible only by boat and floatplane, even this alternative would not totally eliminate the use of liquid petroleum fuels in the park. In fact, the risk of petroleum spills and hazardous situations could increase as the result of boaters transporting fuel in containers aboard their vessels.

Energy conservation is considered in park operations and is recognized as a practice that can reduce the amount of petroleum products required for NPS operations.

At present, the park is actively replacing the fuel systems at the remote ranger stations and Windigo, and is replacing the fuel lines at Mott Island, Windigo, and Rock Harbor with double wall piping. Employees have received intensive training in spill prevention and mitigation, and spill prevention plans are either in place or are in preparation. Each fueling station is provided with absorbent pads for mitigation of small spills incidental to a fueling station. Pumpout stations are provided to make the disposal of sewage from boats easy, therefore helping to prevent this material from being dumped into Lake Superior. The boating industry is actively working to reduce two-cycle engine problems with the shift to four stroke engines and innovative technology for two-stroke engines.

The park is exploring the feasibility of adding a second hull to the gasoline barge to add a measure of safety to that operation. There is no other feasible way to move gasoline from the mainland to the park. The park's administration requires the use of diesel fuel and gasoline since there are no practical alternatives. Similarly, a significant portion of the visiting public would be precluded from visiting the park if fuel sales were banned.

Other Topics

Comment: The plan must emphasize the national significance of Isle Royale National Park as primarily a resource based, wilderness park. Recreation and visitor use decisions flow from this recognition, but are secondary in importance. The plan is heavy on visitor experience and light on resource protection. It appears campground and docking facility placement and density and motor use zones and densities are driven largely by expectations and traditional use by a small percentage of park users.

Response: The park purpose, significance, and park emphasis statements, presented in the planning background section of the *Draft General Management Plan / Environmental Impact Statement*, clearly reflect the national and international significance of Isle Royale and its wilderness/natural resource focus. Along with resource protection, visitor use of national parks is a primary, not a secondary part of the system's mission. In as much as they focus visitor use in resource areas best able to withstand use, park facilities and management zones are as much a part of resource protection as they are support for visitor experiences. In this maritime park, motorboat use is supported, not only by traditional use but by congressional intent. Monitoring for resource protection and visitor experience indicators, as called for in this plan and subsequent carrying capacity and wilderness management plans, will help to ensure use appropriate with resource protection goals.

Comment: The *General Management Plan* should call for a noise ordinance that bans the use of noise-making equipment such as stereos, generators, loud parties in wilderness or within hearing distance of wilderness. It should include a noise mitigation plan that would include the noise ordinance as well as mitigation measures for machinery, motorized vessels, etc.

Response: The plan has been modified to call for noise restrictions in most zones. Also included are commitments to replace park equipment with quieter models as funding allows. Any specific plans needed to implement these actions would be prepared subsequent to approval of the plan.

Comment: Under "Park Operations" the draft plan states that "the schedule and purpose of the M.V. *Ranger III* is to support operations, and services to the concessioner and passengers are secondary." The purpose of the *Ranger III* was and is to complement the added capacity of the lodge rooms and cottages constructed during the same period that the ship was built, i.e., carry more passengers. The *Ranger III* is the "entrance highway to the park". This entrance highway should be open for travel more than four days per week.

Response: This assertion is not true. Legislation appropriating funds for construction of the *Ranger III* describes the primary purpose of the vessel as providing logistical support to park operations, including transportation of freight (supplies, materials, equipment) and fuel. Transportation of park employees whose presence is required on the island is a secondary purpose, and transportation of island visitors is a third purpose. Schedules are established to

meet these needs in an effective and economical manner (see also the comment about *Ranger III* schedules in the Rock Harbor lodge and concessions comment section).

Comment: The *Draft General Management Plan / Environmental Impact Statement* gives no attention to provision of interpretive information, orientation, or preregistration in Minnesota.

Response: The draft plan proposes on p. 34 that park orientation be provided to visitors at the Houghton, Copper Harbor, and Grand Portage (Minnesota) ferry staging areas. Also, private boaters may preregister by purchasing an annual boat pass.

Comment: Access to Edisen Fishery, lighthouses, and other points of interest via NPS or commercial boat trips is not addressed in the plan.

Response: Edisen Fishery, Rock Harbor Lighthouse, and Passage Island Lighthouse are in frontcountry zones, where “day use, interpretation, and educational opportunities would be emphasized” (p. 35). Guided day trips to such areas will continue, and this has been clarified in the plan.

Comment: Comments at a public meeting on the plan alternatives indicated that alternative A (no action) was the most popular, so why does the National Park Service propose to do something other than continue existing conditions?

Response: Written comments and comments at other meetings did not show the same level of support for alternative A, which does not address many of the issues described in the plan. Substantial public support was shown for all of the alternatives. Nevertheless, the selection of a proposed action or a final plan is not determined by vote. In making management decisions, the laws, regulations, and policies that govern the National Park Service and Isle Royale National Park must be followed. The National Park Service must consider the merits of comments received from a diverse public and other agencies and must consider resource information and sound management practices. All the issues and information summarized in both the draft and final documents, including the issues raised in these comments, have been seriously considered. The number of comments in itself is not meaningful because some people comment more than once, and public comment is not structured to represent a statistically valid sample of all interested people.

Comment: It is evident from the language in the plan that deferred maintenance has caught up with the park. However, the need to repair the ravages of time and neglect does not, in and of itself, justify changing to different types of facilities.

Response: The National Park Service agrees that the need to repair or replace facilities does not, in and of itself, justify changing the park’s infrastructure. In no case during the GMP process has the decision to make changes in facilities been made lightly or arbitrarily. Recommendations have been made with considerations related to visitors, management of natural and cultural resources, and long-term operations and maintenance.

Comment: The National Park Service has not demonstrated that the proposed changes in Rock Harbor will result in any real monetary savings or will lead to any significant operational changes in utilities operations. Studies conducted by an NPS engineer, consultation with the Michigan Department of Environmental Quality on wastewater treatment options, and close study of water treatment operations all bear this out.

Response: Proposed changes to concession accommodations at Rock Harbor reflect numerous considerations in addition to NPS utility system costs. These include: the historically low occupancy rate of the motel units, visual impact and appearance of buildings, public desire for some more rustic (and less expensive) units, concession staffing and housing needs, and the desirability of reducing energy and water consumption. Engineering studies did show that substantial utility cost savings, particularly in sewage treatment, could not be accomplished without drastic reductions in overnight visitor accommodations.

Comment: There is a lack of a well-defined bottom-line priority in the draft plan. The five park purpose statements put the plan in the position of trying to accomplish everything. If budgets continue to be tight, where will the park focus its resources? Too much money and attention is being paid to maintenance and development. A bottom-line, number one priority for the park should be included in the plan, and the National Park Service should commit to that priority with supporting financial and staffing investments.

Response: While the National Park Service is largely in agreement with this comment, it believes that the *General Management Plan* has gone as far as it can to accomplish the goal of focusing priorities. National parks are not single-purpose places. All parks struggle with the delicate balances between protection and public access, visitor services and facilities and the costs of maintaining them, and the wide range of often conflicting public needs, demands, and desires and the responsibilities of park managers. This plan has attempted to narrow the park's focus in prescribing the relatively limited range of visitor experiences considered consistent with designated wilderness, acknowledging that only the most significant cultural resources can be protected (at least without help from private funding sources), and recommending actions to increase the sustainability of commercial visitor facilities and decrease their impacts on park resources and operations.

Comment: What is the plan regarding research accommodations such as the Boreal Research Station on Davidson Island or structures used by the wolf-moose researchers? No mention was made in the alternatives regarding these areas/structures.

Response: No changes to these facilities are proposed by the GMP alternatives. Research is supported by the park purpose statement. The park will continue to promote and support research activities.

Comment: The *General Management Plan* should address the investment and changes necessary from the NPS administrative and operational standpoint to achieve the goals of the plan. The plan is incomplete if it provides a new framework for visitor use alone.

Response: Need for administrative staff on the island is determined by the requirements of each alternative. Only alternative C would result in substantive changes in park operations (administrative staff on the island would be significantly reduced, consistent with alternative C's concept as discussed in the plan).

Comment: Several people commented on Isle Royale's designation as an international biosphere reserve under the Man and the Biosphere Programme of the United Nations Educational, Scientific, and Cultural Organization. Most commenters said this designation is not needed because the United Nations should have no say in the management of the park. One commenter asked several questions: who imposed this designation, and by what authority?, what is supposed to happen next under the program?, and who is the ultimate policy maker for our national park system?

Response: In 1980 the park was designated a U.S. Biosphere Reserve under the United Nations Man and the Biosphere Programme in recognition of Isle Royale's global significance as a representative of the Lake Forest Biogeographical Province. The United Nations does not have a coercive role in implementing the biosphere reserve program, nor has the United Nations any role or authority whatsoever in the management of units of the U.S. national park system. Because the National Park Service is an agency of the Department of the Interior, the secretary of interior is the ultimate policy maker for the national park system.

Comment: A reading of the plan leaves the impression that the alternatives are based on relatively sketchy information on park resources. The National Park Service should refrain from establishing fixed management zones, either land- or water-based, until sufficient baseline data becomes available.

Response: Park planning is undertaken with the best available resource information. All desirable information will never be available, especially with the realities of NPS budgets. Delaying the establishment of long-term goals and strategies for park management until some future date when all information is available is not a viable option.

Comment: On page 28, the resources management plan is characterized as one of the "implementation plans to follow this general management plan." However, in appendix B, where the work is scheduled and funded, the resources management plan is not included. The purpose and need section indicates that Isle Royale needs a new resource management plan, which will use inventorying and monitoring data to help make decisions; however, this document does not indicate how that will occur.

Response: The park has an approved *Resources Management Plan*. This plan will be updated to be consistent with the *General Management Plan*, following GMP approval. Although the resources management plan itself is not listed in appendix B, the inventories and monitoring activities that will be included in the plan are listed. Language has been added to clarify these points.

Comments on the Environmental Consequences Section

Comment: Shoreline sediment distribution is not significantly impacted by the dock and breakwater at Siskiwit Bay. Shoreline sediment 45 years ago was essentially the same as it is today; the bay is very shallow with a mud bottom.

Response: There has been a dock in place for many years in the same area as the present dock at Siskiwit Bay. The aerial photography record of this area, which dates back to 1930, indicates that these docks have interrupted the natural current along the shoreline and caused a considerable buildup of sand and silt. A small artificial peninsula is being formed. Because a dock has been at that location for years does not justify leaving the dock and breakwater in place. Removing the dock will allow a return to the natural currents that existed before docks were built.

Comment: There is insufficient presentation of data and analysis in the environmental impact statement. It does not adequately address impacts of Mott Island and does not discuss the impacts of removal of buildings, storage tanks, and utilities in terms of debris, runoff, etc. There is no discussion of the impacts of creating new campsites. The environmental impact statement does not assess impacts of all alternatives equally.

Response: The level of analysis in the draft is necessarily general because of the conceptual nature of the plan. Effects of specific actions related to construction and demolition of facilities will be assessed in specific environmental analyses that will be carried out in advance of such activities. Operations at Mott Island would be substantially modified only in alternative C. These effects are discussed in the impact section for alternative C. Potential consequences of new campsites are discussed throughout the “Environmental Consequences” section of the draft, and mitigation measures are discussed on pages 107 and 108. The alternatives were treated equally in the draft, except that sections on “unavoidable adverse impacts” and “irreversible and irretrievable commitment of resources” were included only for the proposed action, consistent with the approving official’s interpretation of the National Environmental Policy Act and Council on Environmental Quality guidelines.

Comment: The environmental impact statement does not adequately address impacts on natural resources (water quality, aquatic ecology, and wildlife) from motorboat hydrocarbon emissions.

Response: The discussion of water quality impacts has been expanded. However, because these impacts are not believed to be significant at this time, the level of detail remains at approximately the same level as for other impact topics. More detail is provided below.

It is true that motorboats can contribute some (usually small quantities) harmful contaminants into lake waters. As pointed out by the Environmental Protection Agency and others, some two-cycle engines tend to produce more hydrocarbons than certain other engines (usually four-cycle engines). The National Park Service has reviewed studies related to motorboat pollution at diverse locations, including a recent study of hydrocarbon contaminants entering park waters at Crater Lake National Park². Even in areas with much higher boating activity year-round, it has been hard to find documented biological impacts from petroleum hydrocarbons originating from motorboats. Other conclusions of these studies include the following:

Potential contaminants from gasoline spills and incomplete combustion of mixed fuels include BTEX compounds, PAHs, alkyl PAHs, and alkanes. The BTEX (benzene, toluene, ethylbenzene, and xylene) compounds and alkanes tend to break down fairly quickly through biological, chemical, photochemical, and volatilization processes. More resistant to breakdown are PAHs (polycyclic aromatic compounds) and alkyl PAHs. However, even PAHs are subject to rapid loss from the water column due to volatilization and sedimentation. At a heavily boated reservoir in Virginia, the presence of PAHs, especially the lower molecular weight compounds (eg. acenaphthene and naphthalene), in the water column during June probably resulted from recent PAH inputs³.

Removal mechanisms such as photolysis, volatilization, sedimentation, or hydrological processes may explain losses of PAHs from the water column throughout the summer. This is

² “Investigation of the Extent and Significance of Hydrocarbon Contamination Associated With Boat Use at Crater Lake National Park,” project no. CRLA-N-301.002. Investigators: Robert Collier and Bernd (sic) Simoneit, College of Oceanic and Atmospheric Sciences, Oregon State University, Corvallis, OR.

³ Mastran, R.A., A.M. Dietrich, D.L. Gallegher, and T.J. Grizzard. 1994. Distribution of polyaromatic hydrocarbons in the water column and sediments of a drinking water reservoir with respect to boating activity. *Wat.Res.* 28:2353-2366. Portions reprinted with permission of Elsevier Science Ltd, Pergamon Imprint, The Boulevard, Langford Lane, Kidlington OX5 1GB, UK.

in agreement with another study which found the highest hydrocarbon concentrations in Lake Metigoshe, North Dakota, in July (during peak boating activity) and the lowest concentrations in October (low boating activity)⁴.

Recreational boating levels at Isle Royale are relatively low now, and will not be allowed to increase indefinitely. Personal watercraft (jet skis) are prohibited in the park by the *General Management Plan*. Limits on boating may be required in the future if concerns related to resource impacts or visitor experiences become apparent during monitoring. The duration of motorboat use at Isle Royale is not long; most recreational use occurs during June, July, and August. PAH molecules are likely to be well-dispersed given the sheer size and depth of Lake Superior. For all of these reasons, PAH concentrations in water and sediments in coves is expected to be quite low at most locations during most of the year (Roy Irwin, personal communication).

The National Park Service recognizes, however, that it has no baseline information on current petroleum hydrocarbon levels in the Lake Superior waters of the park. The park will initiate proposals to fund research to examine this concern and establish baseline conditions for hydrocarbon levels; this action has been added to the *General Management Plan*. The National Park Service can administratively and temporarily restrict the use of some small water areas in this research effort. If future research or other new information suggests that motorboat use is resulting in ecological harm, additional administrative actions can be taken, and/or the *General Management Plan* can be amended to call for measures to prevent or mitigate such harm. Also, the plan now calls for the National Park Service to take a leadership role at Isle Royale in using cleaner engines and in educating others about clean engine technology. The National Park Service anticipates no discernable adverse effects on water quality or aquatic or other organisms from the proposed plan or any of the action alternatives.

Comment: The collective impact of individual motorboats, when combined with past, present, and reasonably foreseeable future actions and existing systemic pollution, is likely to have significant cumulative effects. There is no good faith effort in the *Draft General Management Plan / Environmental Impact Statement* to identify and explain these indirect and cumulative effects. The direct, indirect, and cumulative impacts of all motorized activity in park waters, including private, commercial, and public transport and support facilities and activities, should be addressed for each alternative. Fuel transportation, storage, and pumping of fuel, accidental fuel spills, leaking fuel tanks, bilge emissions, sewage pumpout spills, boating accidents, plane crashes, and water and sound pollution should also be addressed.

Response: The National Park Service does not agree that changes to motorboat use or park operations as a result of the GMP alternatives are likely to have significant direct, indirect, or cumulative impacts on the environment. Some degradation in water quality could occur if motorboat use significantly increased relative to existing conditions. Although (theoretically) boat use could continue to increase over time in alternative A (no action), this would not occur under the other alternatives, all of which include caps on visitation growth. Therefore, no adverse impacts from motorboat use would occur under any of the action alternatives, including the proposal. The discussion of water quality impacts has been expanded to explain

⁴ Brammer J.D. and R.L. Puyear. 1982. Identification and quantification of water soluble components of outboard motor exhaust and of a gasoline in a North Dakota lake, and a determination of their biological effects upon selected freshwater organisms. NTIS PB83-224436, Springfield, VA.

the reasons for this conclusion. Because the action alternatives would not result in significant increases in boat use compared to alternative A, the contribution to cumulative impacts resulting from this plan would be negligible.

The park has implemented a number of safety practices to reduce the potential for accidental spills to an acceptable level of risk, given the essential role petroleum products play in operations. Regarding the potential for hydrocarbon spills, U.S. Coast Guard-approved spill prevention and contingency (response) plans are in place for NPS vessels that transport and transfer petroleum products in the park. Employees receive spill prevention and response training; practice exercises are conducted to ensure response readiness. The National Park Service is investigating the feasibility of applying a honeycomb overlay product to the gasoline transport barge to achieve a double-walled configuration and reduce spill potential.

A comprehensive spill prevention, control, and counter-measure plan for shore-based storage facilities will be completed and implemented by the 1999 operating season. Storage facility spill response plans are now in place. Bulk storage facilities at Rock Harbor, Mott Island, Malone Bay, Windigo, and Amygdaloid Island have either double-walled storage tanks or are within containment structures. Single-walled distribution piping is being replaced with double-walled piping. This work will be completed at Mott Island and Windigo by early in the 1999 operating season and at Rock Harbor by 2000. All shore-based petroleum storage facilities are inspected by U.S. Coast Guard officials annually. Standard operating procedures that address spill prevention and immediate response needs are in place and are followed during fuel transfer operations. Spill containment equipment is prepositioned for rapid deployment.

A 2-year cycle for pumping and disposing of sewage has been established to control the volume to be handled each time. The practice of pumping sewage into storage tanks has been abandoned and a self-contained sewage pumper truck is used to pumpout holding tanks and to contain the sewage during transport to the mainland for disposal.

Comment: The *Draft General Management Plan / Environmental Impact Statement* does not mention the impacts of continuing seaplane service on residents of the mainland along the flight path.

Response: None of the alternatives propose changing the seaplane service, thus changes to the seaplane service were not assessed.

Comment: The *Draft General Management Plan / Environmental Impact Statement* should address the possibility that private motorboat access increases the probability of domestic dogs entering the park from boat docks, causing the transmission of canine viruses to Isle Royale's wolves. All recreational impacts to wolves and other threatened and endangered species must be fully addressed in the *Environmental Impact Statement* and in formal consultation with the U.S. Fish and Wildlife Service.

Response: The park prohibits domestic mammals within park boundaries and vigorously enforces this regulation. While it is conceivable that more boats (assumed to bring more dogs) could increase the risk of intentional or unintentional violation of the regulations and hikers could bring the virus over on their boots, the only way to completely eliminate the risk would be to not allow people on the island, which is not a reasonable solution. The proposed plan calls for no actions that would increase the risk of virus transmission.

All other reasonably foreseeable recreational impacts to wolves and other proposed, threatened, and endangered species from the alternatives have been discussed in the “Environmental Consequences” section of the draft. No other issues or impacts have been raised by the U.S. Fish and Wildlife Service during their review of the draft (see letter in appendix F).

Comment: Researchers have raised concerns about wolves losing their fear of humans if too many campgrounds are dispersed around Isle Royale.

Response: Dispersal of human activities and/or facilities into new areas, which could cause impacts on wolves and other species, was identified as a concern during the scoping, planning, and environmental analysis process. Minimizing such dispersal of use was a goal during development of the proposed plan. With the exception of a new dock and campground at McCargoe Cove, the draft plan does not propose new campgrounds in areas that do not have a tradition of human activity or use, so associated impacts to wolves and other threatened and endangered species have been avoided. The U.S. Fish and Wildlife Service has concurred with this conclusion.

Comment: One person suggested that the public involvement process for developing the plan was inadequate and out of compliance with NEPA guidelines.

Response: There is no basis for this claim. The public involvement effort for this plan, which is summarized on p. 7 of the draft, exceeded NEPA requirements and typical GMP public involvement programs.

Comment: Even though the National Park Service has been charged with developing a general management plan for the park, should not private citizens, such as representatives of the major user groups, have been included in the decision-making process and included on the planning team?

Response: Individuals and interest groups have been extensively involved in the entire GMP process over the past three years, including scoping, alternatives, and environmental impact analysis through the public involvement process. The Federal Advisory Committee Act, Public Law 92-463, prohibits federal agencies from involving interest groups in decision-making or as “team-members” on federal projects (except when advisory committees are specifically authorized by Congress).

Comment: We are disturbed to see the continuation of the trend towards making a decision first, and then simply manufacturing other alternatives later. NEPA is very clear that the very purpose for requiring differing alternatives is so that the agency and the public may examine possible different actions and their consequences before making any decisions on the matter. In this case, the agency has clearly been working toward a preferred alternative for over a year, well prior to formulating any other alternatives. This was further confirmed at the public meetings, where the only alternative discussed or presented was the proposed action.

Response: This comment is inaccurate and without foundation. Preliminary alternative concepts were presented for public review in a newsletter released in June 1996. In response to public comment, the concepts were revised and full alternatives were presented to the public in a workbook distributed in March 1997. Public meetings on the draft alternatives were also held in March. Following response by the public to the draft alternatives, a preliminary preferred alternative was shared with the public in July 1997. This preliminary preferred alternative was subsequently modified and presented equally with the other

alternatives in the *Draft General Management Plan / Environmental Impact Statement*. Analysis of potential consequences of the alternatives was carried out in conjunction with the development of preliminary concepts (see Appendix A) and continued through the formulation of full draft alternatives and preparation of the draft document. There have been no public meetings where all of the alternatives were not represented.

Comment: Statements regarding potential effects of possible alternatives are vague, generalized, and unsubstantiated. For example, in the proposed action analysis, page 115, under “Threatened and Endangered Species,” the analysis simply states that “Potential disturbance to threatened and endangered species would be minimized by monitoring and managing of visitation levels.” There is no description of what the potential disturbance might be, or how monitoring and managing of visitation levels would occur, or how these practices might minimize potential disturbance.

Response: The statements on p. 115 were intended to be read in context with the “impacts common to the proposed action, alternatives B, C, and E” section beginning on p. 109. Additional language has been added to the impact sections to clarify this information. Monitoring and management of visitation levels are discussed on p. 28 of the draft plan. The U.S. Fish and Wildlife Service has concurred with the determination that the proposed alternative would not be likely to adversely affect listed species or critical habitat (see Appendix F).

Comment: There is no comprehensive listing of the known occurrences of threatened and endangered species (merely a list of all T&E species in the state and a listing of species which “may occur” in the area).

Response: The table in Appendix D is, in fact, the list of state threatened and endangered species that may occur in Isle Royale National Park, and the title has been revised to clarify this. The National Park Service believes that this is the most appropriate list to include. The U. S. Fish and Wildlife Service has concurred with the NPS assessment.

Comment: Nowhere in the document are there any references to accurate scientific analysis or expert agency comments. It may be that the National Park Service feels that these have been gathered, but a large portion of the purpose of the National Environmental Policy Act is disclosure, which allows both the public and the agency to make decisions with the best information possible, something this document does not do.

Response: The reader is referred to Appendix A, which describes the analysis process used and the review and consultation by experts and agencies. Specific references are also included in the “Affected Environment” section. A list of specific consultants can be found on p. 166 of the draft plan.

Comment: Nearly every section in every analysis merely states in a general manner what the alternative in question would do and then even more generalized statements regarding what the effects might be.

Response: General management plans, by NPS policy, are long-range, conceptual guidance documents. The following wording is included in the introduction to the “Environmental Consequences” section of the draft document: “The alternatives in this document establish broad overarching management guidelines. The general nature of the alternatives requires that the analysis of impacts also be general. This means that the National Park Service can make reasonable projections of likely impacts, but these are based on assumptions that may not

prove to be accurate in the future. As a result, this environmental impact statement is programmatic and presents an overview of potential impacts relating to each alternative. This *General Management Plan / Environmental Impact Statement* will serve as a basis for NEPA documents prepared to assess subsequent developments or management actions.” The National Park Service believes that the level of impact assessment is in keeping with the general nature of the draft plan.

Comment: NEPA regulations state : “Agencies shall ensure the professional integrity, including scientific integrity, of the discussions and analysis in environmental impact statements. They shall identify any methodologies used and shall make explicit reference by footnote to the scientific and other sources relied upon for conclusions in the statement. An agency may place discussion of methodology in an appendix.” This information appears nowhere in the document. Nowhere in the document are there references to evidence that the agency has made the necessary analysis.

Response: The reader is referred to the section titled “Impacts Common to the Proposed Action, Alternatives B, C, and E” (p. 109 of the draft) and also Appendix A, which describe the methodologies used for analysis and conclusions. Resource consultants are listed in the “Affected Environment” section and on page 166 of the draft plan.

Comment: The cumulative impact sections are woefully inadequate, as well as extremely inconsistent in terms of the impacts analyzed. Many of the potential consequences, such as impacts on fisheries, impacts on cultural resources, impacts on the ability of people to enjoy various types of recreational activities on Lake Superior as a whole, and opportunities for loon nesting in the entire basin, are never addressed.

Response: The National Park Service has considered whether or not the proposed plan or alternatives could have cumulative impacts that have not been discussed in the draft plan. With the exception of a small potential positive effect on Lake Superior fisheries resulting from alternative C (included in the impact section for that alternative in the final document), no cumulative effects other than those discussed in the draft could be identified.

Comment: There are no real descriptions of “unavoidable adverse effects”, merely a contradictory assertion that first, no negative effects will be likely to occur, and second, there will be unavoidable “risk of adverse impact if the recreational purposes of the park are met.” There is no analysis or justification provided for either of the statements, nor is there any discussion of unavoidable impacts on other resources or uses. The only section containing even this cursory analysis is that of the proposed action.

Response: The wording in the draft document was unclear. The language has been clarified to express the point that while no impacts to wildlife species are anticipated, the mere presence of people could have unforeseen effects, regardless of specific actions and mitigations called for in the plan. The only way to ensure no impact to wildlife would be to allow no use of the island — a solution that is not reasonable.

Discussion of “unavoidable” impacts, when anticipated to be minor or nonexistent, is limited to the proposed action, consistent with the approving official’s interpretation of the National Environmental Policy Act and Council on Environmental Quality guidelines.

Comment: The section discussing “irreversible and irretrievable commitment of resources” is flawed. The only alternative analysis containing this section is the proposed action, and in that analysis, only

cultural resources are considered. Any alternative containing continued use, transportation of, and sales of gasoline will need to deal with discharge of persistent toxins into the waters of Lake Superior.

Response: The National Park Service cannot identify any “irreversible and irretrievable commitment of resources” resulting from the proposed plan, other than those described in the impact section for the proposal (see discussion on water quality concerns above). Discussion of “irreversible and irretrievable commitment of resources,” when anticipated to be minor or nonexistent, is limited to the proposed action, consistent with the approving official’s interpretation of the National Environmental Policy Act and Council on Environmental Quality guidelines.

Native American Treaty Rights

Comment: The language in the section of the draft plan entitled “Native American Treaty Rights” (p. 26-27) should be revised to indicate: (1) treaty rights are beyond the scope of the plan, and any actions taken to implement the plan must conform to the law regarding these rights, (2) to ensure that it honors these rights, the National Park Service would cooperate with those tribes that retain hunting, fishing, and gathering rights at and around Isle Royale, and (3) the National Park Service would routinely consult with tribes having treaty rights and their designated representatives on a government-to-government basis.

Response: The comment was considered and the essence of the language was incorporated. Legally established treaty rights are not currently known. The National Park Service has formally requested this determination. The park is currently consulting with regional tribes on a government-to-government basis.

Comments with Detail Beyond the Scope of the GMP (includes sustainability, carrying capacity, and park operations and visitor services sections below)

Sustainability

Several comments were received that made specific recommendations for ways that the National Park Service could improve the long-term sustainability of park operations. Sustainability is an important long-term goal, and such a statement has been added to the *General Management Plan / Environmental Impact Statement*. Specific actions to improve sustainability are too detailed, however, to include in a general management plan. These detailed suggestions will be considered by the park staff as they undertake implementation of the plan and in subsequent implementation plans. Detailed comments included:

The rental of motorboats on Isle Royale should be phased out in favor of nonmotorized and solar-charged electric watercraft. The National Park Service should set an example of low-impact use and could use the transition as an opportunity to educate the public.

The *General Management Plan / Environmental Impact Statement* should include a plan to replace diesel generators with renewable electricity/heat generation. It should also address waste generation, recycling, and disposal.

Concern was expressed about the increasing impact of park administration and staff presence. The park's reliance on large motorboats compromises the island's integrity as a wilderness park, as does the growing need for staff housing and associated generator-driven utilities. The following solutions were suggested: (1) reconsider the addition of new buildings and focus on using what is already there, (2) vastly increase the use of alternative energy sources such as solar, and (3) vastly decrease staff use of motorboats and look for alternatives such as using money saved on fuel to hire more people to kayak patrol and hike to maintain trails and campgrounds instead of boating.

Composting toilets could be considered in all new development.

The need for diesel fuel transportation and storage (and potential spills) could possibly be reduced by provision of solar-generated electricity.

Carrying Capacity

The legal requirement for general management plans to address visitor carrying capacity is discussed in the Carrying Capacity section above. It is NPS policy to establish goals for visitor experience and resource protection for all areas of a park through management zoning in general management plans. More detailed quantification of use levels appropriate to those management goals and discussion of possible strategies that could be employed to manage use levels if necessary are documented in implementation planning that follows. Several commenters offered recommendations for how to manage visitors or asked detailed questions about how various use level decisions might be made. These comments will be considered during implementation planning subsequent to the approval of this plan. Comments included:

The National Park Service should not spend time and money developing a VERP (carrying capacity) plan for Isle Royale unless it makes the commitment to funding the monitoring that is necessary to make the plan effective. Consider dedicating a percentage of use fees collected from park visitors to a monitoring program.

Comments were received asking for more detail on how visitor numbers might be limited and what indicators might be monitored.

Regarding carrying capacity, the National Park Service should add dispersed individual campsites, then issue a limited number of entry permits so that hikers are not required to file or follow a specified itinerary. This would allow visitors a true wilderness experience.

The general management plan does not address how many and what types of visitors the NPS hopes to serve at Isle Royale. The number of backcountry hikers and one-day visitors is currently limited by the number of water vessels and airplanes that transport them to the island, and this is appropriate. However, the draft plan does not propose any limits for powerboaters, 70% of whom travel to the island via private motorcraft. Eventually the relative balance of hikers, one-day visitors, and lodge users to boaters will favor boaters because there is no transportation limit or barrier for boaters. The plan should include the relative percentages of user groups now, the target percentages for the future, and what potential actions might be taken to preserve the balance between motorboaters and other users.

If the major crowding issues are in the final two weeks of July and all of August, create a system that removes the peak and provides incentives for greater visitation earlier in the

summer. Creating more of a season in June and early July may also assist the concessions operations in smoothing out the peaks and valleys.

For weekend boaters, establish critical weekends that require anchorage and/or limited dock usage. Don't limit the numbers of boaters, but rather regulate the use of limited space. Boaters have the advantage of mobility; use it to spread the impact.

Annual use permits should not be issued to boaters. Such permits are discriminatory because hikers don't have this option, and they are undesirable because they encourage boaters to visit as many times as possible and bring as many people as possible to maximize the value of their pass.

Many more powerboaters than hikers and day users are repeat visitors to the park. The plan should have a specific statement of intent that encourages first time visitors to come to Isle Royale. The *General Management Plan* should discourage repeat visitors, particularly those who may overuse and overtax Isle Royale's wilderness resources.

The requirement for groups of 7-10 people to follow a preordained itinerary and camp in group sites should be dropped. This policy significantly detracts from the island experience (it fosters point-to-point hiking without stopping to look around or enjoy one's surroundings) and does little to improve encounters between smaller groups and the larger group.

Park Operations and Visitor Services

Several comments were received that made recommendations for various park operational programs. While many of these suggestions may have considerable merit, they are too detailed to be included in the plan, which is intended to be a long-range, general guidance document. For example, one commenter requested that a large, permanent dock be built in Hay Bay. Decisions regarding dock size, materials, and other details are beyond the scope of a general management plan. Many such recommendations will be considered, however, as the park moves into more detailed implementation planning. Other detailed comments included:

The National Park Service should consider banning alcohol in park boundaries.

There should be a limit on the size of boats taking dock space and limits on the consecutive number of nights that boats are allowed to stay at docks.

The *General Management Plan* should describe the experience for visitors using the remaining lodge options in the proposed plan, including what they would need to bring and what would be available on the island.

Water taxi service should be started at Windigo to allow for adaptive reuse of Washington Island area cabin and homesites by those without their own boats.

A volunteer boater group could help to educate other boaters, and this type of partnership could extend to other user groups as well. The Isle Royale Natural History Association's charter for education makes it a good choice to assist and direct such volunteer groups.

Several comments were received that suggested changes to the *Ranger III* schedule. Reasons varied, and included reducing the utility load at Rock Harbor and better accommodation of users' schedules.

Private motorboaters should be able to register as park users in advance of their arrival, instead of being required to travel to Windigo or Rock Harbor first.

Several people suggested ways for the park to increase its fund base, such as charging more to use the park, starting an adopt-a-wolf program, and selling wolf novelties such as T-shirts and greeting cards.

The National Park Service has taken the lead in seeking partnerships that can provide large sums of money and/or abundant staffpower. The National Park Service should also be receptive to partnerships with small groups (including single families) who may not be able to provide large sums of money. These people, working under close supervision, can accomplish many actions identified in the general management plan if tasks are broken down into small steps so that volunteers can accomplish useful work in the amount of time they can spend on the island in a given year. Over time, such efforts will provide significant benefits to the park, the general public, and the volunteers.

The National Park Service should discontinue the pumpout service for private boats.

A disproportionate amount of user fee income is being spent on docks. The NPS should use it instead to maintain the *Ranger III*, create more interpretive programs, improve accessibility at Rock Harbor, maintain historic structures, or create informational brochures.

Why is it that the National Park Service comes up with large amounts of money for destruction and removal of facilities, but there is never enough money for rangers, trails, docks, etc.?

Vegetation growth along the Greenstone trail from Mount Franklin to approximately Angleworm Lake has resulted in reduced opportunities to see Lake Superior. Is there potential for limited, controlled burns along this section of trail to improve views and create diverse vegetation for moose?

Funds for the inventory and monitoring of Lake Superior fisheries could be sought from other sources, especially since these are potentially commercially viable fisheries and important recreational game fisheries. This would preserve NPS funds for inventory and monitoring activities on Isle Royale.

Adjusting operating requirements of incidental business permits annually to control the number of people brought to the island by diving, paddling, and hiking charters (see p. 28 of the draft plan) could have a significant impact on holders of permits if instituted without appropriate notice. A minimum of one year notice is needed; 1999 user numbers should be instituted in the spring of 1998 rather than the fall, for example, so that charters could be booked appropriately.